

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA**

Audury Petie Davis and Maryann Butler, Plaintiffs

V.

New American Funding, et al., Defendants

Case No. 1:25-cv-690

**Exhibit P – Risk Summary in Support of Verified Motion to Expedite
Discovery**

This Risk Summary is respectfully submitted in direct support of Plaintiff's Verified Motion to Expedite Discovery, as the underlying facts demonstrate a high likelihood of severe prejudice absent immediate judicial intervention.

A. Background of Abuse

This case is not routine. Plaintiff has endured a series of harmful and obstructive actions by New American Funding, including: the misdirection of sensitive loan documents through unsecured personal email, obstruction of FHA case transfer, improper denial of access to the loan portal, and unjustified delays in communication. These actions not only impeded Plaintiff's ability to secure fair financing but compromised regulatory integrity and borrower protections under HUD guidelines.

B. Evidence of Misconduct

Plaintiff provided extensive documentation including: email bounce-backs proving blocked communication, a voicemail confirming employment verification and acknowledgment of mishandling by the loan officer, and email correspondence showing that loan documents were transmitted outside the protected system. These records were timely filed and verified under penalty of perjury.

C. Attempts to Avoid Litigation

Plaintiff made repeated good-faith attempts to resolve this matter administratively and through pre-litigation demands. These included direct emails to corporate compliance, formal settlement letters, and notices of urgency. All were either ignored or met with

generic responses. The Verified Complaint was filed only after Defendant failed to respond meaningfully.

D. Urgency and Risk to Judicial Economy

The current conduct of Defendant poses a risk not only to Plaintiff but also to the integrity of judicial proceedings. Continued obstruction and refusal to engage increases the likelihood of delayed adjudication, expanded discovery needs, and greater court resource expenditure. Granting expedited discovery is essential to preserving key evidence and ensuring this case moves forward efficiently.

For these reasons, Plaintiff respectfully urges this Court to grant expedited discovery to avoid further injustice and irreparable harm.